

# THE LAW OFFICE OF CARLOS M. SANTIAGO, P.C.

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December 12, 2019

## **VIA ECF**

The Honorable Katherine Polk Failla  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

# MEMO ENDORSED

**Re: United States v. Armando Beniquez  
18 Cr. 236 (KPF)**

Dear Judge Failla:

Defense counsel respectfully requests that Mr. Beniquez's bail conditions be modified to replace his home detention with a curfew. In addition, counsel requests that the government return Mr. Beniquez's passport which was seized during his arrest. This request is being submitted at Pretrial Service's suggestion and the government does not object.

Pretrial suggest that Mr. Beniquez's curfew be set from 8:00 p.m. until 8:00 a.m. daily, or in the alternative, at Pretrial's discretion. The latter would avoid the need for requesting any extensions if circumstances change.

Regarding Mr. Beniquez's passport, Mr. Beniquez does not have legal photo identification except for his passport and it has been extremely difficult for Mr. Beniquez to get additional identification, like a non-driver's I.D., without his passport. Proper photo identification is necessary in order to obtain employment. Having access to his passport will allow Mr. Beniquez to get his affairs in order prior to his voluntary surrender.

This is Mr. Beniquez first request for a modification of bond and all other bail conditions should remain the same.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/

Carlos M. Santiago, Jr.  
Attorney for Mr. Beniquez

cc: Margaret Shalley, co-counsel (via email)  
Ryan Finkel, AUSA (via email)  
Joshua Rothman, PTSO (via email)

Application GRANTED.

Dated: December 12, 2019  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE